

# OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee

35 East Wacker Drive - Suite 1550

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Tel: (702) 357-8149, x104

August 9, 2017

Ms. Elaine Go, Air Quality Specialist  
Clark County Department of Air Quality  
4701 W. Russell Road, Suite 200  
Las Vegas NV 89118

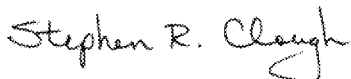
RE: Comments on Draft Minor Source Air Permit No. 17913  
Nevada Environmental Response Trust  
Henderson, Nevada

Dear Ms. Go:

The Nevada Environmental Response Trust (NERT) is pleased to present comments on Draft Minor Source Air Permit No. 17913 for Clark County Department of Air Quality consideration. NERT's comments are provided in the attached letter.

If you have any questions or concerns regarding this matter, feel to contact me at (702) 960-4309 or at [steve.clough@nert-trust.com](mailto:steve.clough@nert-trust.com).

Office of the Nevada Environmental Response Trust



Stephen R. Clough, P.G., CEM  
Remediation Director

CEM Certification Number: 2399, exp. 3/24/19

Cc (via NERT Sharefile Distribution):

Jeff Kinder, NDEP Deputy Administrator  
James Dotchin, NDEP Bureau of Industrial Site Cleanup  
Carlton Parker, NDEP Bureau of Industrial Site Cleanup  
Weiquan Dong, NDEP Bureau of Industrial Site Cleanup  
Christa Smaling, NDEP Bureau of Industrial Site Cleanup  
Frederick Perdomo, Nevada Attorney General's Office  
Alison Fong, U.S. Environmental Protection Agency, Region 9  
Jay Steinberg, as President of the Nevada Environmental Response Trust Trustee and not individually  
Andrew Steinberg, as Vice President of the Nevada Environmental Response Trust Trustee and not individually  
Tanya C. O'Neill, Foley and Lardner, LLP  
Derek Amidon, Tetra Tech  
Dan Pastor, Tetra Tech  
Allan DeLorme, Ramboll Environ  
John Pekala, Ramboll Environ

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Cc (via NERT Stakeholder Sharefile Distribution):

Betty Kuo, Metropolitan Water District of Southern California  
Brenda Pohlmann, City of Henderson  
Carol Nagai, Metropolitan Water District of Southern California  
David Johnson, Central Arizona Water Conservation District  
Dave Johnson, LV Valley Water District  
Eric Fordham, Geopentech  
Jill Teraoka, Metropolitan Water District of Southern California  
Kevin Fisher, LV Valley Water District  
Marcia Scully, Metropolitan Water District of Southern California  
Maria Lopez, Metropolitan Water District of Southern California  
Mickey Chaudhuri, Metropolitan Water District of Southern California  
Orestes Morfin, Central Arizona Water Conservation District  
Peggy Roefer, Colorado River Commission  
Steven Anderson, LV Valley Water District  
Sun Liang, Metropolitan Water District of Southern California  
Ted Wolff, Manatt, Phelps & Phillips LLP  
Todd Tietjen, Southern Nevada Water Authority



August 9, 2017

Elaine Go, Air Quality Specialist  
Clark County Department of Air Quality  
4701 W. Russell Road, Suite 200  
Las Vegas, NV 89118

**Subject:** Comments on Draft Minor Source Air Permit No. 17913

Dear Ms. Go:

On behalf of the Nevada Environmental Response Trust (NERT or Trust), Tetra Tech, Inc. (Tetra Tech) appreciates the opportunity to review Draft Minor Source Permit No. 17913 for the NERT SNWA Weir Dewatering Treatment System and to provide the comments below for Clark County Department of Air Quality (DAQ) consideration.

**Cover**

The City of Henderson and Clark County assigned addresses for the Weir Dewatering Treatment System, which can replace the "0 Pabco Road" currently on the cover of the draft permit. The City of Henderson address is 8403 E. Russell Rd. This address applies to the Sunrise Mountain Pump Station and Centralized Water Treatment Facility. The Clark County address is 8850 E. Russell Rd. This address applies to the Historic Lateral Pump Station.

**Source-wide PTE Summary (Section III.A)**

In NERT's permit application, the facility potential to emit (PTE) was calculated using three of the six 350-kilowatt (kW) generators that will power pumps at the pump stations because the design flow rate limits the system to operation of only three generator/pump sets at one time. DAQ subsequently recommended that PTE be calculated using all six generators, which has no effect on the source's continued classification as a minor source. The incremental increase in PTE for all six generators that DAQ calculated and provides in Table III-A-1 of the draft permit is consistent with NERT's PTE calculation, with one exception: sulfur dioxide (SO<sub>2</sub>).

A Tetra Tech air quality specialist discussed with you this discrepancy in SO<sub>2</sub> values on August 7, 2017. Based on that discussion, NERT understands that it is DAQ procedure to use a single AP-42, Table 3.4-1, emission factor for both large (>600 horsepower) and small (<600 horsepower) diesel engines, even though AP-42, Chapter 3.3, otherwise would have facilities use an alternative, larger emission factor for small engines. Thank you for this clarification. We note it here because NERT will plan to follow the same DAQ guidance when calculating facility emissions under the Section II.C.6.b annual reporting requirement in the permit.

**Summary of Emission Units (Table IV-A-1)**

NERT requests that the dates of manufacture and serial numbers for generators in Table IV-A-1 be presented as *TBD*. The specific dates of manufacture and serial numbers for generators in inventory will be provided by the rental company closer to the time of delivery. The rental agreement does, however, specify in Section 2.02(E)(2) of the

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technical specifications that generators must be equipped with Tier 4i engines, which supports the accuracy of the PTE calculations in the permit.

**Operational Limitations (Section IV.A.3)**

This section states that the Permittee shall operate only three of the six engines at any time. NERT understood that the inclusion of all six generators in the Section III.A calculation of PTE, above, was intended to eliminate this operational control. We suggest that the Section IV.A.3 operational limitation be removed for consistency.

**Control Requirements (Section IV.B.1)**

This section states that the Permittee shall operate each diesel generator engine with a CAT ACERT injection and CAT NOx Reduction System. NERT requests that this section add "...or equivalent controls" to address the potential for the technology to be alternatively identified, but still equivalent in its emission control, at the time that the equipment is provided by the rental company.

**Technical Support Document**

The Technical Support Document (TSD) for the draft permit should be made consistent with any adjustments made to the permit to address the items above. In addition, please correct the typo in the permit number in the header and on Page 4 of the TSD. Please also correct the hydrogen sulfide values in the Source-wide Emission Unit PTE Summary table on Page 3 of the TSD. DAQ identified the values as an error during the August 7 phone discussion between DAQ and Tetra Tech. The values should be reported as zero, rather than the 0.86 ton per year total currently shown.

Thank you for this opportunity to comment. If you have questions regarding the comments, please contact me at (303) 447-1823 or [dan.pastor@tetratech.com](mailto:dan.pastor@tetratech.com).

Sincerely,  
Tetra Tech, Inc.

A handwritten signature in black ink, appearing to read "Dan Pastor", written in a cursive style.

Dan Pastor  
Project Manager

cc: Nevada Environmental Response Trust